



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

May 23, 2019

**BY EMAIL AND ECF**

The Honorable Ronnie Abrams  
United States District Judge  
40 Foley Square  
New York, New York 10007

**Re:     *United States v. Michele Morton, 16 Cr. 371 (RA)***

Dear Judge Abrams:

The Government writes to respectfully request an adjournment of its opposition to the above referenced defendant's motion to withdraw her guilty plea, which is presently due on June 21, 2019. As the Court is aware, on May 31, 2019, the defendant executed a waiver of attorney client privilege in light of the arguments raised in her motion. The Government has requested from prior counsel documents relating to their representation of Ms. Morton, including interview memoranda and email and text message communications between Morton and counsel and between the various counsel on the defense team. Prior counsel has informed the Government that in light of the volume of materials and the necessary internal reviews, such a production will require approximately 30 days. Accordingly, the Government respectfully requests that its brief be due 3 weeks from its receipt of the requested materials, which is August 5, 2019. The Government has conferred with Morton's current counsel who consents to this request.

Respectfully submitted,

AUDREY STRAUSS  
Attorney for the United States, Acting Under  
Authority Conferred by 28 U.S.C. § 515

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cc: Counsel of record